

### Remarks

Reconsideration of the pending application is requested in view of the amendments to the Specification and the Claims, as well as the Applicant's remarks herein.

Applicant would like to thank the Examiner for the thorough examination and office action thereof.

### Objection to the Drawings

In response to the Examiner's objection, Applicant has amended the Specification to add the reference characters in the description. Applicant respectfully submits that the characters added are information readily understood on the face of the Specification as originally submitted. Approval is requested.

### Objection to the Claim

Claim 28 has been amended to comply with the Examiner's instruction.

### Claim Rejections – 35 USC Sec. 102

Claims 1-2, 5-8, 10, 12, 14, 16-26 and 29 are rejected by the Examiner under 35 USC Sec. 102 (b) as being anticipated by Takahashi (USPN 60097313). Applicant respectfully traverses the Examiner's rejection and will explain as follows.

The present invention is directed to a method and system for a local direction-finding network, without the use of the complicated GPS systems. The system according to the present invention uses a tracking unit, e.g. a mobile unit, to locate a target location, e.g. a store, by transmitting signals from the target location to the tracking unit. The tracking unit then verifies the source of the transmission. If matched with the target code entered, the received transmission is used by the tracking unit to determine the physical bearing and strength, hence navigation information, of the source of the transmission relative to the tracking unit. Such determination is based on the physical nature of the transmission, i.e. strength and bearing. The tracking unit can then move closer and closer toward the target location based on the real-time, point-to-point navigation information thus determined. In some situations, multiple target locations may be represented by a single transmitter, which will direct the tracking unit to the desired target location, based on the known locations of the transmitter and the target location.

The present invention can thus help a driver identify the location, or origin, of a selected signal source, since the present invention uses tracking units to detect the target's

signal physical direction in order to determine the source's relative position to the tracking unit. The signal that is broadcasted from the target does not contain any position data; rather, it is the signal's physical nature that is used to determine its bearing and distance to the tracking unit.

Takahashi, on the other hand, does not disclose point-to-point, real-time navigation guidance to help the tracking unit approach the target, based on the physical strength and direction of the received broadcast signal. Takahashi is merely directed to transferring service provider's information to the mobile units, without using the physical signal to determine the bearing and distance relative to the mobile unit. The tracking unit in Takahashi does not determine the real-time, relative position of the target unit to the tracking unit; nor can it do so simply by using the direction and strength of the received broadcast signal. According to Takahashi, it still needs to transmit geographic location information to locate the target, instead of using the physical nature of the transmission for such determination. (Takahashi, col. 12, lines 37-44, lines 11-15; col. 28, lines 17-25; col. 20, lines 46-50). This is a drastic difference between the present invention and Takahashi.

Further, with respect to Claims 12 and 25, the claims are directed to determining the bearing of the target signal by calculating the signal source's relative bearing to the tracking unit. Takahashi merely transmits the geographical information and distance data from the road-side unit (Takahashi, col. 20, lines 16-20). There is no such calculation of related bearing information done by the tracking unit in Takahashi, based on the direction of the received signal.

Applicant has amended the claims to more distinctly clarify the present invention. In view of the above discussion, Applicant respectfully submits that the Examiner's rejection of Claims 1-2, 5-8, 10, 12, 14, 16-26 and 29 should be withdrawn, and allowance be granted.

#### Claim 3-4 Rejections – 35 USC Sec. 103

Claims 3-4 are rejected by the Examiner under 35 USC Sec. 103 as being unpatentable over Takahashi in view of Durst and Neher. Applicant respectfully disagrees with the Examiner's reading of and reliance on Takahashi and directs the Examiner's attention to the discussion set forth in the previous section.

#### Claim 9 and 15 Rejections – 35 USC Sec. 103

Claims 9 and 15 are rejected by the Examiner under 35 USC Sec. 103 as being unpatentable over Takahashi in view of well known prior art (MPEP 2144.03). Applicant

respectfully disagrees with the Examiner's reading and reliance on Takahashi and directs the Examiner's attention to the discussion set forth in the previous section.

Applicant further challenges the Examiner's taking of official notice without citing a prior art reference, since the facts asserted to be well known are "not capable of instant and unquestionable demonstration as being well-known" in the art of providing real-time, point-to-point navigating guidance. The Examiner has not provided any facts, other than making a merely conclusory statement that "it is will known in the art to jointly determine a better frequency to communicate." The Examiner has not provided any specific factual findings predicated on "sound technical and scientific reasoning" to support his conclusion of common knowledge.

#### Claim 11 Rejection

Claim 11 is rejected by the Examiner under 35 USC Sec. 103 as being unpatentable over Takahashi in view of Meadows. Applicant respectfully disagrees with the Examiner's reading and reliance on Takahashi and directs the Examiner's attention to the discussion set forth in the previous section.

#### Claim 13 Rejection

Claim 13 is rejected by the Examiner under 35 USC Sec. 103 as being unpatentable over Takahashi in view of Neher. Applicant respectfully disagrees with the Examiner's reading and reliance on Takahashi and directs the Examiner's attention to the discussion set forth in the previous section.

#### Claim 27 Rejection

Claim 27 is rejected by the Examiner under 35 USC Sec. 103 as being unpatentable over Takahashi in view of Kennedy. Applicant respectfully disagrees with the Examiner's reading and reliance on Takahashi and directs the Examiner's attention to the discussion set forth in the previous section.

#### Claim 28 Rejection

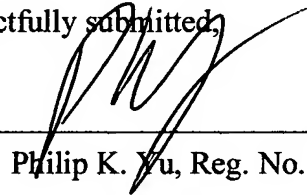
Claim 28 is rejected by the Examiner under 35 USC Sec. 103 as being unpatentable over Takahashi in view of Kennedy and further in view of Cox. Applicant respectfully disagrees with the Examiner's reading and reliance on Takahashi and directs the Examiner's attention to the discussion set forth in the previous section.

In light of Applicant's discussion above regarding Takahashi's inapplicability, it is respectfully submitted that the Examiner's rejections under 35 USC Sec. 103 be withdrawn and allowance of the claims granted.

The Examiner is encouraged to contact the undersigned to discuss any matter relating to the above-identified patent application.

Respectfully submitted,

By: \_\_\_\_\_

  
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I hereby certify that this correspondence is being deposited with the US Postal Service with sufficient postage as First Class mail in an envelop addressed to: Commissioner for Patents, PO Box 1450, Alexandria, VA 22313-1450, on this date: Feb. 15, 2005

By \_\_\_\_\_

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